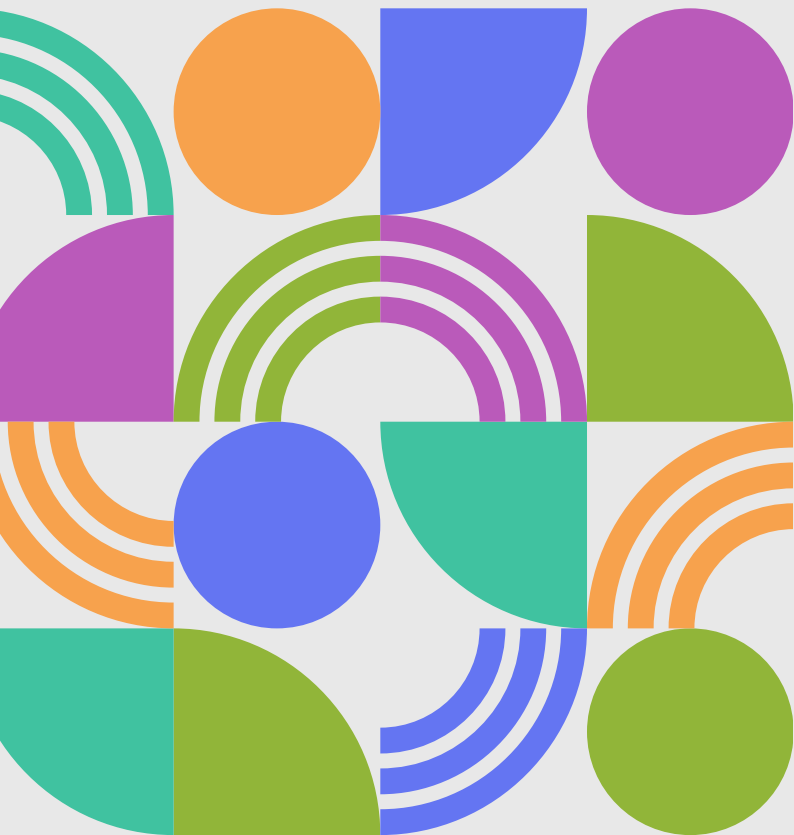
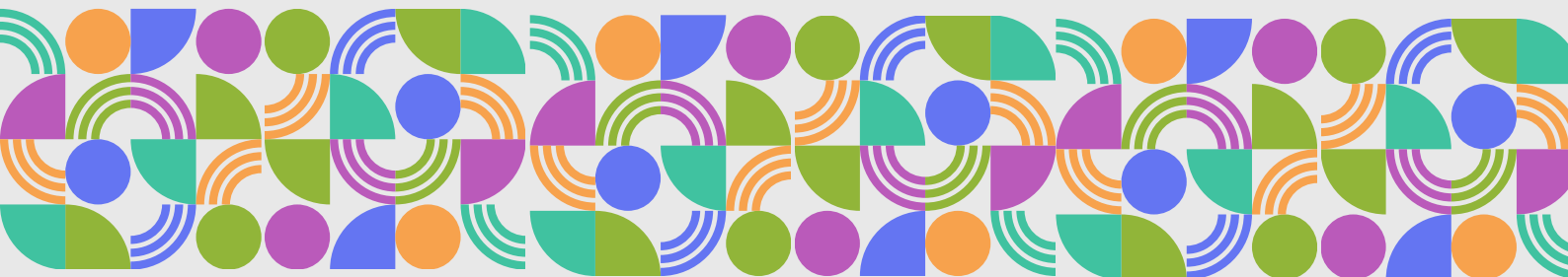

GUIDE TO COMPLETING CLIMATE CHANGE POLICY REVIEW

Isle of Man Climate Change Plan 2022-2027 Deliverable:
C.4 Government-wide policy review to ensure that existing
practices do not restrict our ability to meet our climate goals.



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1. Why do we need a review?

Our climate is changing. The impacts of that change are largely negative and pose significant risks to our economy, community and environment.

The Isle of Man has committed to transition to net zero by 2050, in line with the Paris Agreement, to contribute toward international efforts to limit global temperature increase to below 1.5 degrees. Beyond 1.5 degrees, the impacts of climate change will make life on Earth much more difficult – for example, there would be extensive crop failures leading to food insecurity, more extreme weather disasters and billions of people around the world will be forced to migrate.

Fossil fuels and other high emitting practices are woven into the fabric of modern life – to move away from them in a way that is well-managed and beneficial to our community, it is essential that all of government's activities support that transition and do not hinder it. This will require cooperation and effort from all parts of government.

Delaying or hindering action to reduce emissions is highly likely to increase costs. Working in one part of government to reduce emissions, while another part increases or ignores them is self-defeating and costly. It's really important that all of government's policies are pulling in the same direction.



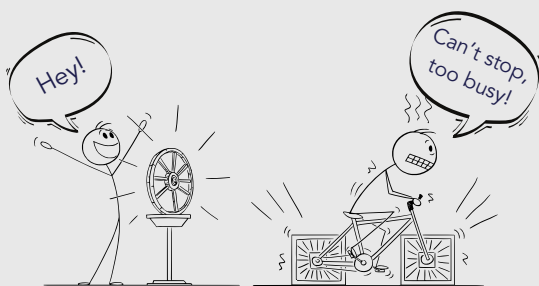
We therefore need to consider how we undertake our functions as public bodies and find new, low emission ways of providing vital services for our Island community. A recent survey showed that 62% of Island residents want government to be doing more to tackle climate change and government workers were even more determined that Government should be doing more (70%). We need to lead the way.

BUSINESS AS USUAL = EMISSIONS AS USUAL

2. This is an opportunity

By conducting this review, we can save money and time and make our operations work for a net zero Island, while still providing high quality essential services.

During COVID we quickly reviewed what was most important and adapted to the crisis. A similar process also happened during preparation for Brexit. We have shown before that we can adapt quickly if we direct our efforts effectively.



The climate and ecological crises may seem less tangible than the pandemic – but they are just as real and much more dangerous. But, we still have time to act and to make changes that will help to protect our economy, community and environment.

Reviewing our policies provides a great opportunity to save time and money, diverting resources away from non-essential activities, simplifying overly complex or bureaucratic processes, and ensuring that none of our efforts to mitigate or adapt to climate change are lost due to unsupportive or contradictory existing practices.

This is an opportunity to not just change business as usual, but to make it better and more conducive to retaining a liveable planet. This is an opportunity to protect our quality of life and the health and wellbeing of our community, economy and environment.



3. Do we have to do this?

Yes, here's why:

This action has been endorsed by two consecutive Councils of Ministers. It originally appeared as action 2.1 in the Isle of Man Government Action Plan for Achieving Net Zero Emissions by 2050. It was not completed before that plan was superseded by the current Isle of Man Climate Change Plan 2022-2027, so it was carried over as action:

C.4 'Government-wide policy review to ensure that existing practices do not restrict our ability to meet our climate goals'

The Climate Change Act 2021 contains the climate change duties for public bodies, as follows:

A public body, in performing its duties, must act in the way that it considers best to contribute to:

- a. the meeting of the net zero emissions target by the net zero emissions target year;
- b. the meeting of any interim target;
- c. supporting the just transition principles and the climate justice principle;
- d. sustainable development, including the achievement of the United Nations sustainable development goals; and
- e. protecting and enhancing biodiversity, ecosystems and ecosystem services.

Public bodies have a legal responsibility to ensure that their policies support these duties – this includes new policies, which should be assessed during development, and existing policies, which are the subject of this document.

To support timely delivery of this action, the Climate Impact Assessment Regulations 2023, which were approved by Tynwald in January 2024 and commence in January 2025, include an 'inactivity' provision. The provision means that a Climate Impact Assessment must be prepared in relation to on-going activities of public bodies, which meet the thresholds set out in the regulations, by the end of the Plan period (2027). For more information about the Climate Impact Assessments or the thresholds see either the Regulations or the Climate Impact Assessment User Guide.

4. Who is responsible?

Each public body is responsible for reviewing its own policies. The Climate Change Transformation Team (CCTT) can provide advice on request – publicbodiesclimate@gov.im

5. What needs to be reviewed?

In this document, the word 'policy' refers to the established ways in which we undertake our functions as public bodies. It encompasses both internal policies, which influence the behaviours of our staff, and external policies, which influence the behaviours of our community.

Policies guide the decisions that we and our community make and we need to make low emission decisions the default. Rules, guidelines, legislation, strategies, plans etc. all need to be considered for review.



6. But what about our other priorities and goals?

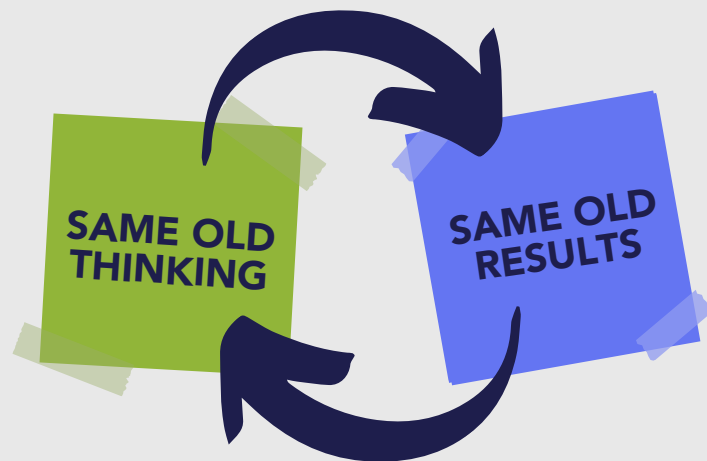
If climate action is not treated as a priority, we will not reach our statutory emissions reduction targets. Public bodies therefore need to find new ways of working so that existing duties can be met in ways that support transition to net zero.

For example, one of the priorities set out in Our Island Plan is to increase housing provision. To do this in a way that is compatible with reducing our emissions, we will need to ensure that new homes are energy efficient, that our electricity supply is decarbonised, that EV charging infrastructure is available and that we develop in areas with the least possible negative impact on carbon storage. These are all things which are already underway.

Another example, from the Economic Strategy, is to “create and fill 5,000 new jobs across new, enabling and existing key sectors, by 2032”. To do this in a way that complies with the climate change duties and supports our transition to net zero we will need to carefully consider what kinds of jobs those are and, wherever possible, ensure that they support the growth of low emission industries and the green economy. If we were to create 5,000 new, high emission jobs, we would then be faced with additional emissions we need to reduce. It’s essential that we don’t make the task of reducing emissions any harder than it already is.

Our existing policies guide our decisions, but we are in a different situation now compared with when most of those policies were set so we need to change our approach by embedding climate into everything we do.

It’s important to remember that this review is not a criticism of existing policies, which may have been very effective at achieving their intended aims at the time they were created. It is a response to our changing world, the new information and the new objectives we now have.



7. How high a priority is this?

If there are policies in place which are working against our transition to net zero, this will make the overall task more difficult and more expensive. It is essential that all the work of government is pulling in the same direction otherwise we cannot make progress. Revision of some policies will be higher impact than others, so it’s important to start scoping and scheduling this work soon.



8. When should this be done?

It should be started immediately and completed by 31 March 2027, or sooner.

9. How long will the review take?

This will depend on the number of items you need to review. Completing the CIA Tool usually takes about an hour, but you won't need to complete a CIA for every policy.

You can schedule the review over the plan period, but it should be completed as soon as possible.

10. What happens if we don't do the review?

You are likely to be asked for updates on your policy review in your annual Public Body Climate Report in the future. If you are found to be non-compliant with your public body climate change duties, the Council of Ministers could ask you to prepare an additional report, explaining how you intend to become compliant.

As government departments, we need to lead by example, demonstrating our commitment to climate action to the Manx public and wider world. Not doing so discourages climate action in the community, slowing our overall progress and creating a reputational risk.

Also, because the public body climate change duties are a legal responsibility, there is a risk of litigation from the public/private sector if government do not comply.

Perhaps most importantly, you risk continuing activities that keep emissions high and stymie progress toward our climate goals. This is not only a waste of money but contributes to the worsening impacts of climate change.

11. I don't think this is relevant to me/my team

The use of fossil fuel and other high emitting practices is woven into almost all aspects of modern life – it's therefore unlikely that none of the activities your public body undertakes have an impact on emissions or could support our Island's transition to net zero. Please get in touch with CCTT to discuss at publicbodiesclimate@gov.im

12. We don't have the time or staff available for this

As explained in sections (1) and (3) above, this work is essential and part of the statutory duties of all public bodies. Not undertaking the review could mean that some existing policies are actively undermining Manx climate action, which could be costing money and taking up time elsewhere.

Creating a plan/schedule for this work will help to manage the workload - start soon and spread the review over time, aiming to complete the review in 2027. For more information on creating a plan, see section 15 below.

13. Can CCTT do this for you?

No, but we can provide advice and guidance.

CCTT is a small team whose role is as a facilitator and programme manager for delivery of the Climate Change Act and Plan. We do not have sufficient staff resources and, importantly, we are not experts in all of the varied areas of government. This review will require sector specific knowledge and expertise. It is therefore not possible for us to undertake this review on your behalf. However, we can provide advice, guidance and tools to help – please contact publicbodiesclimate@gov.im



14. Getting started

You may already be familiar with undertaking policy reviews. You may also already be familiar with the causes of climate change and how emissions can be reduced - but if not, here are some tips to help you get started:

1. Establish roles and responsibilities

Identify who is responsible for delivery of this action for your public body i.e. who will lead this project centrally and who, from across the public body, will need to feed in?

2. Access resources and training

There are lot of resources available to help you.

It is recommended that the person responsible for delivery undertakes Carbon Literacy training. They should also consider who else involved with the project would benefit from this training.

It will be difficult to people to review policies for alignment with our climate goals, if they do not understand those goals or what contributes to them so Carbon Literacy training is likely to lead to better outcomes.

Find out more and book Carbon Literacy Training here:

<https://www.netzero.im/our-programme/climate-change-duties/carbon-literacy-training/>

Other useful resources, such as the Climate Impact Assessment tool and the Fair Change Framework are available here: <https://www.netzero.im/resources/public-bodies/>

3. Scope and plan

Identify the scope of what will be reviewed – i.e. policies, practices and legislation that are under the control of your department. This includes:

- Any legislation for which your department is defined as 'the Department'
- Any other statutory documents, such as policies, strategies etc. (not including reports)
- Internal policy documents, practice guides etc.

Make a plan/schedule for the review. For more information see 'How to make a policy review plan' below.

Ideally, include or refer to this plan in your public body's Climate Change Plan as it is an important part of the climate action your public body is taking.

IMPORTANT

Your policies must still adhere to all other statutory requirements, such as GDPR, Equality, Human Rights etc. If a piece of primary legislation does not support transition to net zero, you will need to consider whether it can be reasonably changed to do so – this may influence your Department's future input into the legislation programme.



15. Making a plan

Some tips for creating your policy review plan:

<p>Look for hotspots</p>	<p>Prioritise policies with an obvious connection to emissions. For more information see section (9) below.</p> <p>Prioritise high cost policies, schemes for example, because if we are actively paying out for activities that do not support our climate goals, this needs to be addressed as soon as possible.</p>
<p>Establish accountability</p>	<p>Group policies by the areas/teams who deal with them, assign the review work accordingly making sure that teams/staff understand that this is a priority.</p>
<p>Monitor progress</p>	<p>Decide how long it will take to complete the review by speaking to the teams/staff involved. Set up a process for getting regular updates.</p>
<p>Ensure capability</p>	<p>See 'Access resources and training' above.</p> <p>Ensure that responsible staff have the information they need to conduct the review effectively.</p>
<p>Look for connections, interdependence and bundles</p>	<p>If a group of documents relate to the same topic, creating a package of measures or policies, consider reviewing them as a bundle.</p> <p>Consider how the policy you are reviewing interconnects with other policies and other public bodies.</p> <p>Break down silos and work with other department or public bodies where policies overlap.</p>
<p>Look for savings and efficiencies</p>	<p>Use this policy review as an opportunity to identify areas where time or costs could be saved.</p> <p>Consider whether non-essential functions could be paused or stopped to allow more time for climate action and other essential services.</p>
<p>Update with Fair Change</p>	<p>Where you identify policies that do not support transition to net zero, you will need to develop alternatives. To do this, continue to use the CIA Tool in conjunction with the Fair Change Framework.</p>
<p>Think long-term</p>	<p>Not all policies can be changed immediately, so make a schedule for future changes, taking into account the necessary governance.</p>



16. What does an 'obvious connection to emissions' look like?

The previous section recommends prioritising policies with 'an obvious connection to emissions' - but what does that look like?

This list is not exhaustive but provides some examples of policies that are likely to have an impact on emissions. In most cases the impact can be positive or negative, depending on the policy...

Sector	Policies relating to...
Electricity	<ul style="list-style-type: none"> • How energy is generated. • Energy efficiency and energy use, eg. tariffs, metering. • Data storage and use.
Buildings	<ul style="list-style-type: none"> • How and where buildings and infrastructure are constructed. • How buildings are used, particularly in relation to energy and fuel, eg. cost of fuels, energy efficiency measures and behaviours. • Types, costs and accessibility of heating systems for buildings. • Working from home policies.
Transport	<ul style="list-style-type: none"> • Costs relating to transport eg. vehicles, fuels, taxes, fares, parking, etc. • The accessibility of different forms of transport, including locations, safety, affordability etc. • The location of services, businesses and homes. • Policies relating to commuting, business travel etc. • High emission forms of transport eg. aviation.
Agriculture, Land and Sea	<ul style="list-style-type: none"> • Changes in land use. • Sustainable/unsustainable farming or fishing practices. • Activities that affect biodiversity, habitats or carbon sinks, eg. pollution, development etc.
Business	<ul style="list-style-type: none"> • Procurement. • Business support schemes. • Education and training. • High energy use and high emitting business practices.
Waste	<ul style="list-style-type: none"> • Procurement. • How waste is disposed of. • Accessibility and affordability of correct disposal routes, recycling, repair services etc.

IMPORTANT

Care should be taken in relation to all support schemes and subsidies to avoid investing in high emitting activities or approaches - instead support should be directed toward encouraging and supporting low emission approaches.

17. How do I know if a policy needs to be changed?

You have identified hot spots, made a plan and are ready to start reviewing - but how will you know whether a policy needed to be updated?

Firstly, keep this question in mind:

Does this policy support our Island's transition to net zero by 2050?

You can use the Climate Impact Assessment (CIA) Tool to work this out, but do not need to use it in all cases.

Here are some pointers:

A policy that supports transition to net zero:	
increases, enables, encourages, incentivises, subsidises, makes easier or makes cheaper	decreases, disables, discourages, dis-incentivises, penalises, makes more difficult or makes more expensive
low emission behaviours	high emission behaviours

A policy that DOES NOT support transition to net zero:	
decreases, disables, discourages, dis-incentivises, penalises, makes more difficult or makes more expensive	increases, enables, encourages, incentivises, subsidises, makes easier or makes cheaper
low emission behaviours	high emission behaviours



18. Updating your policies

As a result of the review process you are likely to discover policies that need updating.

When considering how to update them, i.e. creating a proposal for a new or amended policy, you may need to undertake a Climate Impact Assessment.

When making changes to a policy you must consider the Fair Change principles. One way of doing this is by using a Climate Impact Assessment.

The four Fair Change principles form part of the climate change duties for public bodies and help to guide the way we reduce emissions - so that we do so in ways that maximise benefit and minimise risk/harm.

The Fair Change Framework provides detailed advice on how to maximise alignment with the Fair Change principles via socially inclusive policy development.

THE FAIR CHANGE PRINCIPLES

JUST TRANSITION

CLIMATE JUSTICE

**SUSTAINABLE
DEVELOPMENT**

**BIODIVERSITY &
ECOSYSTEMS**

For more information about the Fair Change principles, click on the buttons above or visit netzero.im/publicbodies

Cost will also be a factor in the policy changes you can make but you should aim to consider long-term sustainability and not just short-term, direct or up-front costs. Environmentally and socially unsustainable decisions are likely to carry indirect or future costs which should not be ignored. The Climate Impact Assessment tool can help you to identify these costs and there are more detailed methodologies available if you have concerns about a particular outcome. Please contact CCTT if you would like more information.

Updating your policies may take time and require research, engagement and sign-offs, potentially at a political level. How you manage this is up to you but it may be useful to group changes to similar policies into bundles to reduce admin and paper work.

You can organise this work in a similar way to your review plan, for example, by prioritising amendments with the largest emissions savings (or those with both emissions and cost savings).

When making changes to policies, you must adhere to the applicable governance processes.

19. What if I need help?

You can contact the CCTT at publicbodiesclimate@gov.im

Where applicable, please include a link to your completed CIA and let us know what areas are causing concern.

We also recommend undertaking Carbon Literacy training, as this will provide you with a strong foundation of knowledge around climate change.



20. Useful links and resources

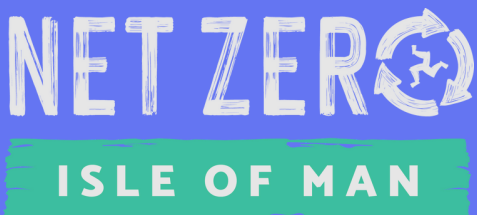
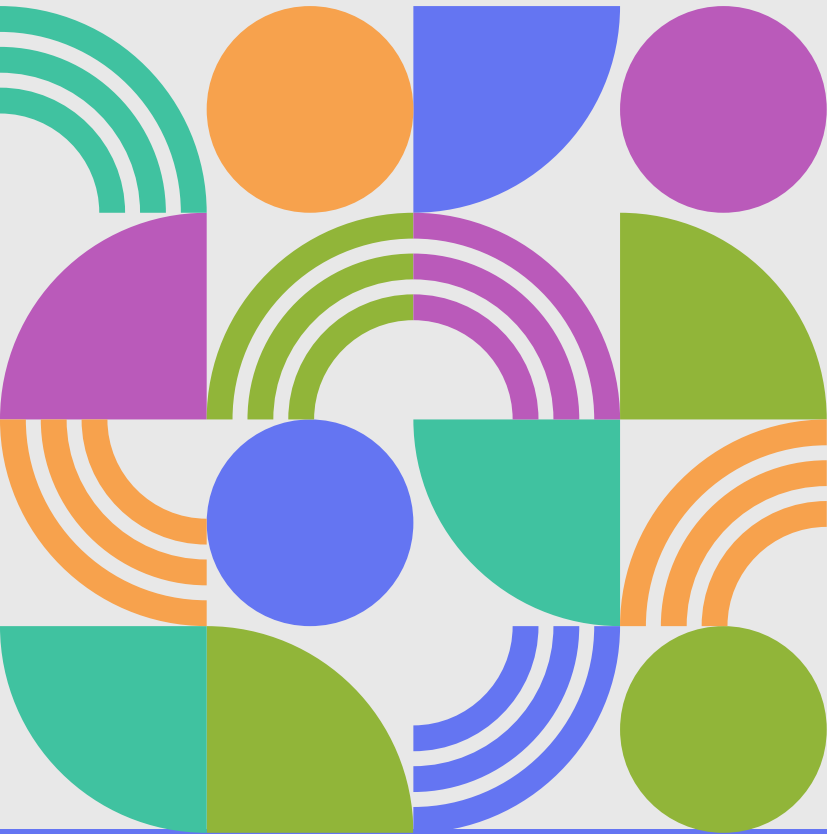
[Public bodies web page - multiple resources](#)

[Isle of Man Climate Change Plan 2022-2027](#)

[The Fair Change Framework](#)

[Climate Impact Assessment Regulations 2023](#)

[Book Carbon Literacy training](#)



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